

ERIC T. SANDERS
Alaska Bar No. 7510085
FELDMAN ORLANSKY & SANDERS
500 L Street, Suite 400
Anchorage, Alaska 99501
Telephone: (907) 272-3538
Facsimile: (907) 274-0819
Email: sanders@frozenlaw.com

Attorneys for Plaintiffs
Harbor Enterprises, Inc., and North 60 Petro Ltd.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE**

HARBOR ENTERPRISES, INC., and)
NORTH 60 PETRO LTD.,)
)
Plaintiffs,)

vs.)

WPT HOLDINGS LIMITED, f/k/a WHITE)
PASS TRANSPORTATION LIMITED, and)
RUSSELL METALS, INC., f/k/a FEDERAL)
INDUSTRIES, LTD.,)

Defendants/Third Party Plaintiffs,)

vs.)

UNITED STATES OF AMERICA,)
UNITED STATES ARMY, CHEVRON)
CORP., and STANDARD OIL COMPANY)
OF CALIFORNIA,)

Third Party Defendants.)

Case No. 3:01-cv-00029-HRH

MOTION TO EXTEND STAY

In September 2003, the Court granted a stay of these proceedings “to allow for the completion of the ongoing environmental assessment of the subject property and a determination of a method of remediation/risk management that will be acceptable to the Canadian environmental authorities.” During the past four and a half years the environmental assessment of the property has been diligently pursued under the Interim Remediation Plan Lost Sharing Agreement.

At the present time the detailed site assessment is in the hands of the Canadian environmental authorities. The plaintiffs cannot predict whether the Canadian authorities will approve a remediation plan this year, but it is certainly possible. Accordingly, the plaintiffs move for a stay of these proceedings until March 31, 2009.

Dated this 28th day of March, 2008.

By /s/ Eric T. Sanders

FELDMAN ORLANSKY & SANDERS
500 L Street, Suite 400
Anchorage, Alaska 99501
Telephone: (907) 272-3538
Facsimile: (907) 274-0819
Email: sanders@frozenlaw.com
[Alaska Bar No. 7510085]

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March 2008,
a copy of the foregoing **Motion to Extend Stay**
was electronically served on:

William M. Bankston
Bankston Gronning O'Hara P.C.

Richard L. Pomeroy
U.S. Attorney's Office

Robert C. Bundy
Dorsey & Whitney

Stephen M. Ellis
Delaney, Wiles et al.

By: /s/ Eric T. Sanders